

Exhibit A

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 Lucas E. Buckley as Trustee of the
 Gox Victim Bitcoin Trust*

THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC), Bitcoin
 Gold (BTG), Bitcoin SV (BSV), and Bitcoin
 Cash (BCH) seized from
 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,

Defendant,

Lucas E. Buckley, as Trustee of the Gox
 Victim Bitcoin Trust,

Claimant.

Case No. 20-7811 RS

HON. RICHARD SEEBORG
 United States District Judge

**CLAIMANT LUCAS E. BUCKLEY’S,
 AS TRUSTEE OF THE GOX
 VICTIM BITCOIN TRUST,
 RESPONSES AND OBJECTIONS TO
 PLAINTIFF’S SPECIAL
 INTERROGATORIES
 SET NO. 1**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, the Civil Asset
 Forfeiture Reform Act, 18 U.S.C. § 983 et, seq., and Supplemental Rule G(6), Claimant Lucas E.
 Buckley, as Trustee of the Gox Victim Bitcoin Trust ("Claimant" or "Buckley"), by and through
 its attorneys, Hecht Partners LLP, hereby responds to Plaintiff’s Special Interrogatories, Set No. 1

(the "Interrogatories"). Claimant made a good faith effort to respond to these Interrogatories based on information available at the time. Discovery is still ongoing and Claimant reserves the right to amend, supplement, correct, or clarify any response in accordance with local practice, the Federal Rules of Civil Procedure, the Local Rules of the Northern District of California, and any other applicable rules.

GENERAL OBJECTIONS

Each of Claimant's responses, in addition to any specifically stated objections, is subject to and incorporates the following General Objections. The assertion of the same, similar, or additional objections, or a partial response to an individual Interrogatory does not waive any of Claimant's Objections.

1. Claimant objects that the Interrogatories and the corresponding instruction to produce documents as overbroad and beyond the restricted scope of Rule G(6) permitting limited special interrogatories only on "claimant's identity and relationship to the defendant property" for purposes of determining standing.

2. Claimant objects to any Interrogatory to the extent that it seeks communications between Claimant and its counsel or documents evidencing such communications, which are protected by the attorney-client privilege or work-product privilege.

3. Claimant objects to any Interrogatory that seeks information constituting or containing information prepared in anticipation of or as a result of litigation or which is otherwise protected by the work product doctrine.

4. Claimant will answer the Government's Interrogatories to the best of its ability using information known by Claimant and using those documents within Claimant's possession, custody, or control. Claimant will conduct reasonable diligence to identify information necessary to respond to the interrogatories. Claimant does not, and will not, answer Plaintiff's Interrogatories on behalf of any other entities or individuals.

1 5. Claimant objects to any Interrogatory to the extent that it purports to impose upon
2 them any obligation beyond those imposed by the Federal Rules of Civil Procedure, including,
3 but not limited to, any Interrogatory that exceeds the scope of Supplemental Rule G(6).

4 4. Claimant objects to these Interrogatories to the extent that they are overbroad,
5 unduly burdensome, vague, ambiguous, confusing, require speculation to determine their
6 meaning or use imprecise specifications of the information sought.

7 5. Claimant objects to any Interrogatory as unduly and unnecessarily burdensome
8 to the extent that it seeks information that is a matter of public record, already in the Plaintiff's
9 possession, or otherwise readily available to the Plaintiff, and, therefore, may be accessed and
10 obtained by Plaintiff with less burden than Claimant can identify and provide requested
11 information.

12 6. Claimant objects to any Interrogatory to the extent that it seeks information
13 neither relevant to the subject matter of this litigation nor reasonably calculated to lead to the
14 discovery of admissible evidence.

15 7. Claimant objects to any Interrogatory to the extent it is a contention
16 interrogatory. Pursuant to Fed. R. Civ. P. 33(c), Claimant objects to any such interrogatory on
17 the grounds that it is premature in light of the present stage of discovery. Claimant expects to
18 receive further documents and information through discovery that will concern and provide
19 information responsive to such interrogatories. Accordingly, in response to any such contention
20 interrogatory, Claimant will provide a response encompassing the current state of their
21 knowledge, belief, and understanding, but reserves the right to supplement their interrogatory
22 response pursuant to Fed. R. Civ. P. 26(e), both as to the merits of this action and with respect
23 to experts designated to testify at trial.

24 8. These General Objections are applicable to, and hereby incorporated in their
25 entirety, into each and every one of the following Specific Objections and Responses, whether
26 specifically raised below or not. The following Objections and Responses shall not operate as a
27 waiver in whole or part of these General Objections.
28

SPECIFIC OBJECTIONS AND RESPONSES

SPECIAL INTERROGATORY NO. 1: State your full name for all names by which you are or have been known, including any and all aliases.

RESPONSE TO SPECIAL INTERROGATORY NO. 1: Subject to the above objections, Claimant responds as follows: Lucas Evan Buckley, in his capacity as Trustee for the Gox Victim Bitcoin Trust, a Wyoming Statutory Trust.

Special Interrogatory No. 2: State your Social Security Number and all Social Security Numbers you have used.

RESPONSE TO SPECIAL INTERROGATORY NO. 2: Subject to the above objections and Federal Rule of Civil Procedure 5.2, Claimant responds as follows: [REDACTED].

Special Interrogatory No. 3: List all Alien Registration Numbers you have been assigned or you have used.

RESPONSE TO SPECIAL INTERROGATORY NO. 3: Subject to the above objections, Claimant responds as follows: No such numbers exist.

Special Interrogatory No. 4: State the extent and describe with particularity the nature of your possessory interest in the defendant Bitcoin.

RESPONSE TO SPECIAL INTERROGATORY NO. 4: Subject to the above objections, Claimant responds as follows: The Gox Victim Bitcoin Trust's beneficial owner has assigned his rights and interest in the defendant Bitcoin to Lucas Buckley as Trustee of the Gox Victim Bitcoin Trust. The Trustee, acting through his agents possesses all rights and interests in collecting the beneficial owner's interest in the defendant Bitcoin. The Gox Victim Bitcoin Trust does not have possession of the defendant Bitcoin or any portion thereof, as the defendant Bitcoin is currently in possession of the United States of America.

Special Interrogatory No. 5: State the extent and describe with particularity the nature of your ownership interest in the defendant Bitcoin.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:** Subject to the above objections,
2 Claimant responds as follows: Claimant incorporates by reference his response to Interrogatory
3 No. 4.

4 **Special Interrogatory No. 6:** On what date(s) did you obtain your interest in the defendant
5 Bitcoin?

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:** Claimant objects to this interrogatory
7 as overbroad to the extent it seeks information about rights held by Claimant in trust which may
8 constitute an interest in the defendant Bitcoin but is not limited to the bitcoin currently at issue as
9 set forth in the currently operative Claim filed by the Claimant. Such a request would be overly
10 burdensome and would require review of information currently not available to Claimant as it is
11 in the possession of the Plaintiff or a third party such as the Mt. Gox corporation. In the event such
12 information becomes available to Claimant during discovery in this matter, Claimant reserves his
13 right to amend these responses and objections accordingly pursuant to Federal Rule of Civil
14 Procedure 26(e).

15 Subject to the above objections, Claimant responds as follows: the 25th day of January,
16 2021.

17 **Special Interrogatory No. 7:** Identify the person(s) from whom you obtained your interest in the
18 defendant Bitcoin.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:** Claimant objects to this interrogatory
20 as overbroad to the extent it seeks information about rights held by Claimant in trust which may
21 constitute an interest in the defendant Bitcoin but is not limited to the bitcoin currently at issue as
22 set forth in the currently operative Claim filed by Claimant. Such a request would be overly
23 burdensome and would require review of information currently not available to Claimant as it is
24 in the possession of the Plaintiff or a third party such as the Mt. Gox Corporation. In the event
25 such information becomes available to Claimant during discovery in this matter, Claimant reserves
26 his right to amend these responses and objections accordingly pursuant to Federal Rule of Civil
27 Procedure 26(e).
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1 Subject to the above objections, Claimant identifies the following individual: Roman
2 Hossain.

3 **Special Interrogatory No. 8:** Describe the circumstances of each transaction by which you
4 acquired or obtained any possessory interest in the defendant Bitcoin.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:** Claimant objects to this interrogatory
6 as overbroad to the extent it seeks information about the rights held by Claimant in trust which
7 may constitute an interest in the defendant Bitcoin but is not limited to the bitcoin currently at
8 issue as set forth in the currently operative Claim filed by Claimant. Such a request would be
9 overly burdensome and would require review of information currently not available to Claimant
10 as it is in the possession of the Plaintiff or a third party such as the Mt. Gox corporation. In the
11 event such information becomes available to Claimant during discovery in this matter, Claimant
12 reserves his right to amend these responses and objections accordingly pursuant to Federal Rule
13 of Civil Procedure 26(e).

14 Subject to the above objections, Claimant responds as follows: Claimant acquired the right
15 to possess the Bitcoin at issue by agreement signed by the individual identified in response to
16 Interrogatory No. 7, which agreement assigned all rights and interest in the defendant property to
17 the Gox Victim Bitcoin Trust, executed on the 25th day of January 2021.

18 **Special Interrogatory No. 9:** Describe the circumstances of each transaction by which you
19 acquired or obtained any ownership interest in the defendant Bitcoin.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:** Claimant objects to this interrogatory
21 as overbroad to the extent it seeks information about the rights held by Claimant in trust which
22 may constitute an interest in the defendant Bitcoin but is not limited to the bitcoin currently at
23 issue as set forth in the currently operative Claim. Such a request would be overly burdensome and
24 would require review of information currently not available to Claimant as it is in the possession
25 of the Plaintiff or a third party such as the Mt. Gox corporation. In the event such information
26 becomes available to Claimant during discovery in this matter, Claimant reserves his right to
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1 amend these responses and objections accordingly pursuant to Federal Rule of Civil Procedure
2 26(e).

3 Claimant further objects on the grounds that the term “circumstances” is vague and
4 ambiguous as applied to the execution of one or more transaction.

5 Subject to the above objections, Claimant responds as follows: The assignment of rights
6 was executed by the signature of the individual identified in response to Interrogatory No. 7.

7 **Special Interrogatory No. 10:** Explain the reason(s) for obtaining your interest in the defendant
8 Bitcoin.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:** Claimant objects to this
10 interrogatory as overbroad to the extent it seeks information about the rights held by Claimant in
11 trust which may constitute an interest in the defendant Bitcoin but is not limited to the bitcoin
12 currently at issue as set forth in the currently operative Claim. Such a request would be overly
13 burdensome and would require review of information currently not available to Claimant as it is
14 in the possession of the Plaintiff or a third party such as the Mt. Gox corporation. In the event such
15 information becomes available to Claimant during discovery in this matter, Claimant reserves his
16 right to amend these responses and objections accordingly pursuant to Federal Rule of Civil
17 Procedure 26(e).

18 Claimant further objects on the grounds that the term “reason(s) for” is vague and
19 ambiguous as applied to the execution of one or more transaction.

20 Subject to the above objections, Claimant responds as follows: Claimant Trust obtained
21 the rights to and interest in the defendant bitcoin for the purposes of owning and vindicating those
22 rights for the benefit of the Trust’s beneficiaries. Claimant Trust obtains the right to collect
23 damages on behalf of Mt. Gox Victims from any sources other than from the estate currently held
24 by the Japanese Trustee for the Mt. Gox corporation.

25 **Special Interrogatory No. 11:** List each and every document evidencing, recording, facilitating,
26 or otherwise supporting the assertion in paragraph 5 of your claim that the “claimed Property”
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ended up in Silk Road's wallets following the hacks and theft of Bitcoins from the Mt. Gox Exchange.

RESPONSE TO SPECIAL INTERROGATORY NO. 11: Claimant objects that this Interrogatory is overbroad and premature in that it requests Claimant to recite all evidence to support its case. The request goes beyond the restricted scope of Rule G(6) permitting limited special interrogatories on "claimant's identity and relationship to the defendant property" for purposes of determining standing rather than merits-based discovery that is not yet open under Rule 26.

Claimant objects on the grounds that this interrogatory seeks discovery about documents created by counsel or with the assistance of counsel in preparation for or in furtherance of this litigation.

Without prejudice to Claimant's right to supplement this response and his rights to invoke the option to produce documents under Rule 33(d) of the Federal Rules of Civil Procedure, without waiver of any attorney client or work product privilege that attaches to any of these documents, and Subject to the above objections, Claimant responds as follows:

- a) The public blockchain ledgers for Bitcoin and all of its hard forks;
- b) "Mt Gox and Silk Road Financial Trail.docx" Created 01-21-2021 and its Attachments:
 - i. Defendant's Exhibit 3.pdf;
 - ii. DIAGRAM 1.pdf;
 - iii. EXHIBIT C - Mt Gox Email 20130210.pdf; and
 - iv. EXHIBIT D - Defendan'ts Exhibit B3.pdf
- c) "Mt Gox_Silk Road Seized Funds Preliminary Report.docx" Created 01-10-2021 and its Attachments:
 - i. 2368291c68642d7d91109c5763b3b9401ed40fa48b44f716c5ee3974e0c030c9 (1).png;
 - ii. BTCC-Gox-SR-IX-2012-Hash.docx;

- 1 iii. Annex A - Complaint for Forfeiture.pdf;
- 2 iv. Annex C -
- 3 Connection_transfers_from_Silk_Road_Marketplace_to_1BADznNF3W1
- 4 gi47R65MQs754KB7zTa_GuYZ.csv;
- 5 v. Annex D - Graph_Gox_Corp_1HQ_Analysis.png;
- 6 vi. Annex B - MtGoxWallets-GoxCorp.xlsx;
- 7 vii. Annex E - Connection_transfers_from_Silk_Road_Marketplace_to_BTC-
- 8 e.com.csv;
- 9 viii. Annex_F Connection_transfers_from_MtGox_com_to_Silk
- 10 _Road_Marketplace. xlsx;
- 11 ix. sample_remision_petition_ - _gm.pdf; and
- 12 x. 295281232-Appeal-Brief.pdf
- 13 d) FinanceFeeds _ MTGOX's bankruptcy trustee updates on US seized funds
- 14 releaseThe world's Forex industry news source.pdf;
- 15 e) 20170308_announcement.pdf; and
- 16 f) 162503556-Mt-Gox-Wells-Fargo-Seizure-Warrants. Pdf.

17 **Special Interrogatory No. 12:** Identify all witnesses, including the names, addresses, and
 18 telephone numbers of such witnesses, to the assertion in paragraph 5 of your claim that the
 19 “claimed Property” ended up in Silk Road’s wallets following the hacks and theft of Bitcoins from
 20 the Mt. Gox Exchange.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:** Claimant objects that this
 22 Interrogatory is overbroad and premature because it requests Claimant to identify all witnesses,
 23 including expert witnesses, to support its case and, as such, the request goes beyond the restricted
 24 scope of Rule G(6) permitting limited special interrogatories on “claimant’s identity and
 25 relationship to the defendant property” for purposes of determining standing and not merits-based
 26 discovery that is not yet open under Rule 26. Claimant objects to this interrogatory on the grounds
 27 that it is premature as it seeks discovery of information about the identity and personal information
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1 of witnesses that can only be found via discovery in this matter. For instance, discovery from the
 2 Plaintiff, Individual X, and the current Trustee for the Mt. Gox corporation, and other third parties
 3 is necessary to respond to this interrogatory. In the event such information becomes available to
 4 Claimant during discovery in this matter, Claimant reserves his right to amend these responses and
 5 objections accordingly pursuant to Federal Rule of Civil Procedure 26(e).

6 Subject to the above objections, Claimant identifies the following potential witnesses: (a)
 7 “Individual X”; (b) Nobuaki Kobayashi, the Trustee of the Mt. Gox corporation, or his appointed
 8 representative or custodian of records; (c) the custodian of records for the Plaintiff, the United
 9 States; (d) Ross W. Ulbricht; and (e) Mark Karpeles.

10 **Special Interrogatory No. 13:** Identify each and every document that, to your knowledge,
 11 evidences, records, or otherwise indicates that you have been appointed as, and currently are, the
 12 Trustee of the Gox Victim Bitcoin Trust.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

14 Claimant objects on the grounds that this interrogatory seeks discovery about documents
 15 created by counsel or with the assistance of counsel in preparation for or in furtherance of this
 16 litigation.

17 Without prejudice to Claimant’s right to supplement this response and his rights to invoke
 18 the option to produce documents under Rule 33(d) of the Federal Rules of Civil Procedure, without
 19 waiver of any privilege protection, and Subject to the above objections, Claimant responds as
 20 follows: (a) “Gox Victim Bitcoin Trust Assignment Agreement” Created on 1-25-2021; (b) The
 21 Certificate of Trust filed with the Wyoming Secretary of State for the Gox Victim Bitcoin Trust;
 22 (c) The Trust Agreement of the Gox Victim Bitcoin Trust, a Wyoming Statutory Trust.

23 **Special Interrogatory No. 14:** Identify each and every document that, to your knowledge,
 24 evidences, records, or otherwise indicates that Bitcoins from the hacks and theft from the Mt. Gox
 25 Exchange did not go to Silk Road’s wallets.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:** Claimant objects that this
 27 Interrogatory is overbroad and premature in that it requests Claimant to recite all evidence to
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1 support or contradict its case. The request goes beyond the restricted scope of Rule G(6) permitting
 2 limited special interrogatories on “claimant’s identity and relationship to the defendant property”
 3 for purposes of determining standing rather than merits-based discovery that is not yet open under
 4 Rule 26.

5 Claimant objects on the grounds that this interrogatory seeks discovery about documents
 6 created by counsel or with the assistance of counsel in preparation for or in furtherance of this
 7 litigation and are therefore privileged.

8 Claimant objects to this interrogatory as vague, ambiguous, overbroad, and unduly
 9 burdensome to the extent it seeks information about all “Bitcoins from the hacks and theft from
 10 the Mt. Gox Exchange” and is not limited to the bitcoin currently at issue as set forth in the
 11 currently operative Claim that are the subject of this forfeiture. Such a request would be overly
 12 burdensome and would require review of information currently not available to Claimant as it is
 13 in the possession of the Plaintiff or a third party such as the Mt. Gox corporation. In the event such
 14 information becomes available to Claimant during discovery in this matter, Claimant reserves his
 15 right to amend these responses and objections accordingly pursuant to Federal Rule of Civil
 16 Procedure 26(e).

17 Without prejudice to Claimant’s right to supplement this response and his rights to invoke
 18 the option to produce documents under Rule 33(d) of the Federal Rules of Civil Procedure and
 19 Subject to the above objections, Claimant responds as follows: Claimant is not aware of any such
 20 documents.

21 **Special Interrogatory No. 15:** Describe any prior circumstances in which you claimed an interest
 22 in any Bitcoin, including the defendant Bitcoin, which originated from, or was ever transferred to
 23 or from, the Mt. Gox Bitcoin Exchange.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:** Claimant objects to this
 25 interrogatory as overbroad to the extent it seeks information about the rights held by Claimant in
 26 trust which may constitute an interest in the defendant Bitcoin but is not limited to the bitcoin
 27 currently at issue as set forth in the currently operative Claim filed by Claimant.
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1 Subject to the above objections, Claimant responds as follows: No such prior circumstances
2 exist.

3 **Special Interrogatory No. 16:** Describe any reports, letters, memoranda, notes, or other document
4 prepared by you or on your behalf that relates to the defendant Bitcoin or any Bitcoin which
5 originated from, or was ever transferred to or from the Mt. Gox Bitcoin Exchange.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

7 Claimant objects that this Interrogatory is overbroad and premature in that it requests Claimant to
8 recite all evidence to support its case. The request goes beyond the restricted scope of Rule G(6)
9 permitting limited special interrogatories on “claimant’s identity and relationship to the defendant
10 property” for purposes of determining standing rather than merits-based discovery that is not yet
11 open under Rule 26.

12 Claimant objects on the grounds that this interrogatory seeks discovery about documents
13 created by counsel or with the assistance of counsel in preparation for or in furtherance of this
14 litigation and are therefore privileged.

15 Claimant objects to this interrogatory as overbroad to the extent it seeks information about
16 the rights held by Claimant in trust which may constitute an interest in the defendant Bitcoin but
17 is not limited to the bitcoin currently at issue as set forth in the currently operative Claim filed by
18 the Claimant. Claimant objects to this interrogatory as vague, ambiguous, overbroad, and unduly
19 burdensome to the extent it seeks information about all “Bitcoin which originated from, or was
20 ever transferred to or from the Mt. Gox Bitcoin Exchange” and is not limited to the bitcoin
21 currently at issue as set forth in the currently operative Claim that are the subject of this forfeiture.
22 Such a request would be overly burdensome and would require review of information currently
23 not available to Claimant as it is in the possession of the Plaintiff or a third party such as the Mt.
24 Gox corporation. In the event such information becomes available to Claimant during discovery
25 in this matter, Claimant reserves his right to amend these responses and objections accordingly
26 pursuant to Federal Rule of Civil Procedure 26(e).
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Without prejudice to Claimant's right to supplement this response and his rights to invoke the option to produce documents under Rule 33(d) of the Federal Rules of Civil Procedure and Subject to the above objections, Claimant responds as follows: Claimant incorporates by reference his responses and objections to Interrogatory No. 11.

SPECIAL INTERROGATORY NO. 17: Identify all individuals involved in stealing the defendant Bitcoin from any and all cryptocurrency accounts under your control, past and present.

RESPONSE TO SPECIAL INTERROGATORY NO. 17: Claimant objects that this Interrogatory is premature because it goes beyond the restricted scope of Rule G(6) permitting limited special interrogatories on "claimant's identity and relationship to the defendant property" for purposes of determining standing and not merits-based discovery that is not yet open under Rule 26. Claimant objects to this interrogatory on the grounds that is premature as it seeks discovery of information about the identity and personal information of witnesses that can only be found via discovery in this matter. For instance, discovery from the Plaintiff, Individual X, the current Trustee for the Mt. Gox corporation, and other third parties is necessary to respond to this interrogatory. In the event such information becomes available to Claimant during discovery in this matter, Claimant reserves his right to amend these responses and objections accordingly pursuant to Federal Rule of Civil Procedure 26(e).

Claimant objects to this Interrogatory as unduly burdensome to the extent that it seeks information already or solely in the Plaintiff's possession or otherwise readily available to the Plaintiff, and, therefore, may be accessed and obtained by Plaintiff with less burden than Claimant can identify and provide requested information. Such a request is overly burdensome and would require review of information currently not available to Claimant as it is in the possession of the Plaintiff or a third party. In the event such information becomes available to Claimant during discovery in this matter, Claimant reserves his right to amend these responses and objections accordingly pursuant to Federal Rule of Civil Procedure 26(e).

Claimant further objects to this Interrogatory on the grounds that it is vague and ambiguous as to the term "involved in" as it applies to "stealing the defendant Bitcoin."

1 Subject to the above objections, Claimant responds as follows: As alleged in the
 2 Government's First Amended Complaint, Individual X, whose identity is known only to the
 3 government, was determined to have been involved in transactions that relate to
 4 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx. (Amended Complaint ¶ 21, 22). Other
 5 individuals who may have been involved in some capacity or have personal knowledge include
 6 Ross W. Ulbricht; and Mark Karpelès.

7 **Special Interrogatory No. 18:** List each and every document evidencing, recording, facilitating,
 8 or otherwise relating to your answer in response to Special Interrogatory No. 4.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:** Claimant objects on the grounds that
 10 this interrogatory seeks discovery about documents created by counsel or with the assistance of
 11 counsel in preparation for or in furtherance of this litigation.

12 Subject to the above objections, Claimant responds as follows: Claimant incorporates by
 13 reference his responses and objections to Interrogatory No. 13.

14 **Special Interrogatory No. 19:** List each and every document evidencing, recording, facilitating,
 15 or otherwise relating to your answer in response to Special Interrogatory No. 5.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:** Claimant objects on the grounds that
 17 this interrogatory seeks discovery about documents created by counsel or with the assistance of
 18 counsel in preparation for or in furtherance of this litigation.

19 Subject to the above objections, Claimant responds as follows: Claimant incorporates by
 20 reference his responses and objections to Interrogatory No. 13.

21 **Special Interrogatory No. 20:** List each and every document evidencing, recording, facilitating,
 22 or otherwise relating to your answer in response to Special Interrogatory No. 6.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:** Claimant objects on the grounds that
 24 this interrogatory seeks discovery about documents created by counsel or with the assistance of
 25 counsel in preparation for or in furtherance of this litigation.

26 Subject to the above objections, Claimant responds as follows: Claimant incorporates by
 27 reference his responses and objections to Interrogatory No. 13.

1 **Special Interrogatory No. 21:** List each and every document evidencing, recording, facilitating,
2 or otherwise relating to your answer in response to Special Interrogatory No. 7.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:** Claimant objects on the grounds that
4 this interrogatory seeks discovery about documents created by counsel or with the assistance of
5 counsel in preparation for or in furtherance of this litigation.

6 Subject to the above objections, Claimant responds as follows: Claimant incorporates by
7 reference his responses and objections to Interrogatory No. 13.

8 **Special Interrogatory No. 22:** List each and every document evidencing, recording, facilitating,
9 or otherwise relating to your answer in response to Special Interrogatory No. 8.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:** Claimant objects on the grounds that
11 this interrogatory seeks discovery about documents created by counsel or with the assistance of
12 counsel in preparation for or in furtherance of this litigation.

13 Subject to the above objections, Claimant responds as follows: Claimant incorporates by
14 reference his responses and objections to Interrogatory No. 13.

15 **Special Interrogatory No. 23:** List each and every document evidencing, recording, facilitating,
16 or otherwise relating to your answer in response to Special Interrogatory No. 9.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:** Claimant objects on the grounds that
18 this interrogatory seeks discovery about documents created by counsel or with the assistance of
19 counsel in preparation for or in furtherance of this litigation.

20 Subject to the above objections, Claimant responds as follows: Claimant incorporates by
21 reference his responses and objections to Interrogatory No. 13.

22 **Special Interrogatory No. 24:** List each and every document evidencing, recording, facilitating,
23 or otherwise relating to your answer in response to Special Interrogatory No. 10.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:** Claimant objects on the grounds that
25 this interrogatory seeks discovery about documents created by counsel or with the assistance of
26 counsel in preparation for or in furtherance of this litigation.

1 Subject to the above objections, Claimant responds as follows: Claimant incorporates by
2 reference his responses and objections to Interrogatory No. 13.

3 **Special Interrogatory No. 25:** List each and every document evidencing, recording, facilitating,
4 or otherwise relating to your answer in response to Special Interrogatory No. 15.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:** Subject to the above objections,
6 Claimant responds as follows: No such documents currently exist.

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9 Dated: March 4, 2021

10 **HECHT PARTNERS LLP**

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12 By: /s/ Maxim Price
13 Maxim Price (admitted *pro hac vice*)
14 Kathryn Lee Boyd (SBN 189496)
15 David L. Hecht (admitted *pro hac vice*)
16 Alan Alvela (admitted *pro hac vice*)

17 *Attorneys for Intervenor Claimant*
18 *Lucas E. Buckley as Trustee of the*
19 *Gox Victim Bitcoin Trust*
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VERIFICATION

I, Lucas E. Buckley, as Trustee of the Gox Victim Bitcoin Trust, am the representative of the Gox Victim Bitcoin Trust for the purpose of answering the Plaintiff's Special Interrogatories, Set No. 1. My answers to those interrogatories, which are true to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 4 day of March, 2021



Lucas E. Buckley

CERTIFICATE OF SERVICE

I hereby certify that on this March 4, 2021, a true and correct copy of **Claimant Lucas E. Buckley's, as Trustee for the Gox Victim Bitcoin Trust, Responses and Objections to Plaintiff's Special Interrogatories, Set No. 1** was served via E-Mail on the parties of record listed below.

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/s/Maxim Price
Maxim Price